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*Counsel for Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RENÉ QUIÑONEZ and  
MOVEMENT INK LLC,

**Plaintiffs,**

V.

UNITED STATES OF AMERICA; and JEFF AGSTER, EVA CHAN, STEPHEN FAJARDO, MARK HODGES, ROBIN LEE, and DOES 1 through 2, United States Postal Service and United States Postal Inspection Service officials in their individual capacities.

#### Defendants.

Case No. 3:22-cv-3195-WHO

**STIPULATED REQUEST  
TO RESET HEARING DATE OF  
PENDING MOTIONS TO DISMISS  
[ECF 64, 65]**

Judge: Hon. William H. Orrick

Plaintiffs, Defendant United States, and the appearing individual Defendants respectfully stipulate to and request under Local Rule 6-2 that the Court reset the hearing date for Defendants' pending motions to dismiss Plaintiffs' Second Amended Complaint, from July 12 to June 21. This is the first request for a modification of time regarding the pending motions.

Defendants initially planned to notice the motions hearing for June 21, but Plaintiffs

**Stipulated Request to Reset Hearing Date of Pending Motions to Dismiss  
Case No. 3:22-cv-03195-WHO**

1 requested that they notice it for June 28 because of a scheduling conflict. On May 17, Defendants  
 2 did so. On May 18, the Court reset the date from June 28 to July 12. But Plaintiffs' counsel will be  
 3 out of the country for a previously planned vacation on July 12. And Plaintiffs' counsel's conflict  
 4 with June 21 has since been resolved. Accordingly, Plaintiffs and Defendants respectfully stipulate  
 5 to and request that the hearing be reset to June 21.

6 We note that, accounting for the parties' and the Court's availability, if June 21 is no longer  
 7 available, it appears the next opportunity for the hearing will not be until October 11. This is based  
 8 on the Court's posted availability, Plaintiffs' counsel's July travel, and Defendants' counsel's July  
 9 to October parental leave.

10 This stipulated request is supported by the accompanying declaration by Plaintiffs' counsel.

11 Dated: May 19, 2023

12 s/ Jaba Tsitsuashvili

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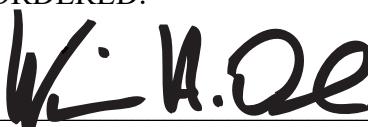
21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22 Dated: May 22, 2023

23 s/ Michael A. Keough

24 ISMAIL J. RAMSEY (CABN 189820)  
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25 *Counsel for the United States and the  
 appearing Individual Defendants*

26   
 27 Hon. William H. Orrick  
 United States District Court Judge